

1 Taylor M. Hennessey
2 Assistant Attorney General
3 1116 West Riverside Avenue, Suite 100
Spokane, WA 99201-1106
(509) 456-6382

4 **THE HONORABLE MARY K. DIMKE**

5 **UNITED STATES DISTRICT COURT**
6 **EASTERN DISTRICT OF WASHINGTON**

7 ROBERT THEODORE
KINNUNE,
8 Plaintiff,
9 vs.
10 STATE OF WASHINGTON,
WASHINGTON STATE
DEPARTMENT OF SOCIAL
AND HEALTH SERVICES,
11
12 Defendants.

NO. 2:23-cv-00026-MKD
THIRD DECLARATION OF
TAYLOR M. HENNESSEY
IN SUPPORT OF
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT

14 I, Taylor M. Hennessey, declare and state as follows:

15 1. I am over the age of 18, competent to testify and make this
declaration on personal knowledge.

16 2. Attached as Exhibit X are true and correct excerpts of the transcript
of the deposition of Robert Kinnune.

17 3. Attached as Exhibit Y are true and correct excerpts of the transcript
of the deposition of Joey Frost.

18 I declare under the penalty of perjury under the laws of the United States

19
20
21
22
THIRD DECLARATION OF
TAYLOR M. HENNESSEY IN
SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

1 of America that the foregoing is true and correct.

2 DATED this 2 day of January, 2024, in Spokane County, Washington.

3 ROBERT W. FERGUSON
4 Attorney General

5 s/Taylor M. Hennessey
6 TAYLOR M. HENNESSEY, WSBA No. 54135
7 Assistant Attorney General
8 1116 W. Riverside, Suite 100
9 Spokane, WA 99201-1106
10 509-456-3123
11 Taylor.Hennessey@atg.wa.gov

10
11
12
13
14
15
16
17
18
19
20
21
22

THIRD DECLARATION OF
TAYLOR M. HENNESSEY IN
SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

2

ATTORNEY GENERAL OF WASHINGTON
Torts Division
1116 West Riverside, Suite 100
Spokane, WA 99201-1106
(509) 456-3123

CERTIFICATE OF SERVICE

I certify that I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James W. Beck
Janelle E. Chase Fazio
Eric D. Gilman
Beck Chase Gilman PLLC
705 S. Ninth Street, Suite 305
Tacoma, WA 98405
(253) 289-5104
James@bcglawyers.com
Janelle@bcglawyers.com
Eric@bcglawyers.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 2 day of January, 2024, at Spokane, Washington.

ROBERT W. FERGUSON
Attorney General

s/ Taylor Hennessey
TAYLOR M. HENNESSEY, WSBA No. 54135
Assistant Attorney General
1116 W. Riverside, Suite 100
Spokane, WA 99201-1106
509-456-3123
Taylor.Hennessey@atg.wa.gov